U.S. Department of Housing and Urban Development
Office of Policy Development and Research

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Proposed Revisions to the HUD Minimum Property Standards

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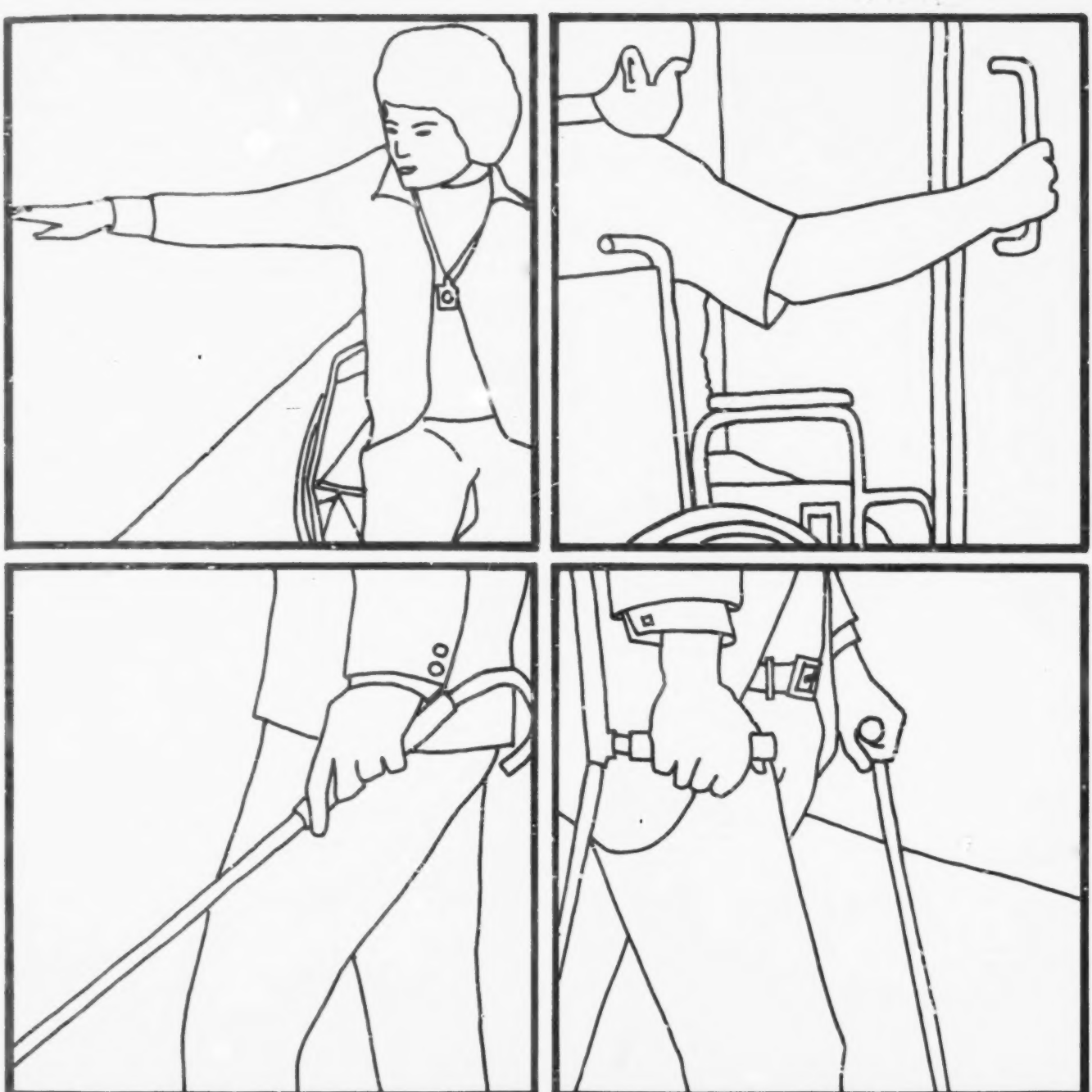

Proposed Revisions to the HUD Minimum Property Standards

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The research and studies forming the basis for this report were conducted by Syracuse University pursuant to a contract with the U.S. Department of Housing and Urban Development (HUD) Office of Policy Development and Research. The statements and conclusions contained herein are those of the contractor and do not necessarily reflect the views of the U.S. Government in general or HUD in particular. Neither the United States nor HUD makes any warranty, expressed or implied, or assumes responsibility for the accuracy or completeness of the information herein.

FOREWORD

Over the last decades, Americans have been learning to see what we have never seen before. I refer not to flying saucers but to people -- people who have been hidden from us by prejudice, by custom, and by ignorance. Ralph Ellison described the phenomenon for blacks in his powerful novel, The Invisible Man.

Today, finally, we see the black population; we are only beginning to see other groups -- women, the American Indian, the elderly, the handicapped -- see them both as national resources and as groups having claims on the national conscience.

This publication is one of a series of six, the titles of which are listed in the acknowledgements, that HUD's Office of Policy Development and Research has sponsored to accomplish the important task of making buildings accessible to and usable by the physically handicapped through improving the American National Standards Institute's A117 standard.

Prepared under the supervision of the Office of Policy Development and Research, these volumes have won a research award from Progressive Architecture. To quote from the jury comments: "In terms of the effect that the work will have on future architecture and planning, the new ANSI standard A117.7 has got to be the blockbuster of all.....It's a very solid piece of work."

It is indeed. I am proud to present it to you.

Donna E. Shalala
Assistant Secretary
for Policy Development
and Research

Introduction

The research leading to the proposed ANSI A117.1 (1977), Making Buildings and Facilities Accessible to and Usable by Physically Handicapped People, included extensive human factors experiments, the design (but not construction) of modifications to three existing residential buildings, and the development of prototypical plans for three multi-family dwelling units. This work identified several needs for revisions to HUD's Minimum Property Standards (MPS) for single family, multi-family and care-type housing. This report proposes specific revisions to those documents and gives supporting comments.

Recommendation 1

The approved ANSI A117.1 (1977) should be adopted by reference in the MPS for multi-family housing.

Commentary: Revisions to the MPS must be submitted to a review and public comment process similar to that now underway for the proposed ANSI A117.1 (1977). To incorporate the accessibility requirements from ANSI A117.1 into the MPS would mean that the standard would have to be integrated, paragraph-by-paragraph, into the MPS format. Drawings would also have to be redone in the MPS style. To insure accuracy, such integration would have to be done under supervision of the ANSI Committee through its chairman and secretary. Nevertheless, several parts of the standard would probably be omitted, e.g. the General Principles and the Scope and Purpose, Foreword, and Definitions, since they do not fit into the format of the MPS. These sections are particularly important for explaining the provisions and rationale behind the proposed ANSI A117.1 requirements. Even with the involvement of the ANSI Committee in making the transfer, a person reviewing the MPS, who may have little understanding of barrier-free design and no familiarity with the proposed ANSI A117.1, would have difficulty putting isolated accessibility requirements into perspective. Moreover, through the MPS review, opponents of the extension of accessibility standards to housing would have a chance to criticize the inclusion of important criteria without any technical evaluation of their comments by accessibility experts. Handicapped people and their advocates would not have a major role in the process since such groups are usually not consulted for their input by HUD's Technical Standards Division. The proposed ANSI A117.1 (1977) has received and reflects critical comment and suggestions from all facets of the housing industry, as well as from consumers and government agencies. The Technical Standards Division has been kept well-informed during the entire process of developing the document and have had several opportunities to make detailed comments. Therefore, it is unnecessary and risky to integrate the accessibility requirements derived from the proposed ANSI A117.1 (1977) into the MPS and thereby subject them to another public review process. This may result in ambiguous, ineffective and conflicting accessibility considerations in the MPS.

Recommendation 2

Existing accessibility requirements for elderly and handicapped dwellings in the MPS for multi-family housing, that are redundant or conflict with the proposed ANSI A117.1 (1977) should be deleted. In addition, the MPS Manual of Acceptable Practice should be revised to reflect the proposed ANSI A117.1 (1977) requirements and recommendations.

Comments: If Recommendation 1 is followed, redundancy and conflict in the documents must be eliminated to avoid confusion and to insure that FHA reviewers will refer to ANSI A117.1 (1977). The Manual of Acceptable Practice already includes some accessibility examples. The existing examples should be updated to meet the proposed ANSI A117.1 (1977). More extensive information and alternatives could be provided in the following areas:

1. Kitchen design for adaptability,
2. Alternative bathroom layouts,
3. Grab bar reinforcement areas and recommended installation,
4. Shower design,
5. Alternative apartment layouts to show circulation requirements and doorway maneuvering clearances,
6. Furniture clearances,
7. Parking,
8. Stair alternatives.

Appendix A in the proposed standard provides many examples that could be incorporated in the Manual.

Recommendation 3

The MPS for multi-family housing should still include requirements in addition to the accessibility criteria of ANSI A117.1 when the project is for elderly or disabled people.

Commentary: The existing MPS includes criteria for projects designated specifically for elderly and disabled people in italics. These criteria are not solely accessibility criteria. They include requirements concerning the habitability, security, safety and social relations as well (e.g. space needs to accommodate furniture, recreation rooms, public toilets, emergency alarms, etc.). These criteria should remain in the MPS -- it is only accessibility that should be referenced to ANSI A117.1 because the Standard is limited to accessibility.

Recommendation 4

The existing MPS requirement for 10 percent of units in multi-family housing for the elderly to be accessible should be revised. All multi-family housing for the elderly and disabled people should comply with ANSI A117.1 (1977). All such units should be equipped with grab bars.

Commentary: The elderly can be considered a population at risk in terms of accessibility since disability in the form of chronic conditions and impairments are associated with age. All housing specifically built for elderly people and people with disabilities should meet the proposed ANSI A117.1 (1977) Standard to provide a full measure of accessibility and usability. Since the proposed standard only requires adaptability in housing, there are not requirements for the inclusion of grab bars in dwelling units, except for planning for future installation of grab bars where they may be necessary. However, if it is known that elderly and disabled people will live in specific units, the grab bars should be provided from the beginning. There are recommendations for the location and design of such grab bars in the proposed ANSI Standard. These should be incorporated in the Minimum Property Standards as requirements in units designed for the elderly and the handicapped.

Recommendation 5

There should be an exception to Recommendation 4 for dwelling units for the elderly that are in multi-story buildings without elevators. Only ground level dwelling units should be required to be served by accessible paths of travel in such buildings.

Commentary: The MPS do not prohibit stairs as the only means of access to dwelling units for the elderly. Since many elderly people can walk stairs easily, it would be unnecessarily restrictive to prohibit their use in housing for the elderly. Such an approach would eliminate the possibility of building garden apartments as housing for the elderly.

Recommendations 6 and 7

In multi-family housing, other than housing for the elderly, application of proposed ANSI A117.1 (1977) should be required for at least 5 percent of all units and recommended for all ground level units in buildings where stairs are the sole means of access to some apartments, and for 50 percent of apartments in elevator equipped buildings. Regional offices of the Federal Housing Administration should develop requirements for specific proportion of adaptable units to be required in multi-family housing built through FHA programs based on local conditions.

Commentary: Application of accessibility requirements to all multi-family housing across the board would result in a severe constraint on the types of housing available in a community. Ground floor units of garden apartments and units in multi-family structures are the easiest to make accessible. However, experience in several states suggests that 5 percent is not too little to be less than demand, nor too much to exceed demand for accessible units. But, the actual number of such units that should or could be accessible in a complex is difficult to determine without a knowledge of local housing types, the availability of accessible units in a community, and the need for such units. Thus, HUD should not mandate the extent of accessibility beyond a minimum

without knowledge of local conditions. As recommendations, ground floor units and 50 percent of elevator served units, could be considered as "best practice" goals. HUD might also require review and approval of regional office requirements by headquarters staff.

Recommendation 8

In the MPS for single-family housing, the ANSI A117.1 (1977) should be recommended for use. Such a recommendation should suggest that builders develop a standard model that can be adapted easily.

Commentary: Single-family housing is located in a wide variety of sites, is most often built for families, and is often built along traditional lines. To require application of the standard to all single-family homes or even a percentage that are not built for the elderly or handicapped people, would put unnecessary restraints on the design and construction of units that have stairways. Stairways can reduce construction costs and have functional and aesthetic benefits. Most single-family homes are built by builders who construct many identical homes from standard plans. On the speculative market, a handicapped person could easily have a home constructed to their needs by a local builder. If the builder had a plan of an adaptable unit available, even before such a client appeared, the cost of building an adaptable unit would be significantly lower than if the builder had to design a new unit or modify a standard model for the handicapped client.

Recommendation 9

Accessibility criteria should be integrated into the MPS for care-type facilities.

Commentary: Most individuals in care-type facilities have a degree of physical impairment that require more support by the physical environment than those who live independently. As such, the building and site should be accessible beyond minimum accessibility conditions. The proposed ANSI A117.1 (1977) does, however, include recommendations in explanatory notes. These can be used as one source of design criteria for inclusion.

Recommendation 10

In the Manual of Acceptable Practice, an addition should be made to the drawing showing a typical space above a counter and below a wall cabinet. It should be noted in the drawing, that, for accessible dwelling units, this space must be a maximum of 12 inches when the counter is 36 inches high in order to reduce the height of wall cabinet shelves.

Commentary: Although there are no specific requirements for the space above a counter or under a wall cabinet in the MPS, the drawing in the Manual of Acceptable Practice would conflict with the requirements of ANSI A117.1 (1977). Wall cabinet shelves cannot be reached at all by people who use a wheelchair and also have restrictions in reaching limitations unless they are lowered to 48 inches, measured to the top of the

bottom shelf. It would be very expensive to require adjustable heights in wall cabinets. It should be noted that when kitchen counters are lowered to a height usable by people who use wheelchairs or who are sitting when at work, the space between counter and wall cabinets would become much greater than the 15 to 18 inches shown in the Manual of Acceptable Practice.

Recommendation 11

The requirement for a desk in the bedroom of one-bedroom apartments for the elderly should be deleted.

Commentary: One bedroom apartments for the elderly can be made accessible without an increase in floor area above the requirements of the MPS. The MPS allows two alternatives for determining floor areas. One is the use of a table showing minimum square footages for each room. The second alternative is the use of layouts that permit the use of specific furniture required for each space in the dwelling unit. For one-bedroom apartments for the elderly, there is a requirement for a desk in the bedroom as well as a requirement for a desk in the living room. To provide clearances for the use of a wheelchair or crutches in a bedroom with a desk would require an unnecessary increase in floor space in the bedroom beyond that required in the table of minimum floor areas for rooms.

Recommendation 12

The MPS should require additional storage in dwelling units to make up for the lost space due to the removal of base cabinets under the sink and the mix center. It should not be required that this space be provided through additional base or wall cabinets. Such space could be provided by closets located close to, and with direct access to, the kitchen work area.

Commentary: The removal of base cabinets is necessary to provide accessibility to kitchen work areas by people who use wheelchairs. Approximately 30 cubic feet is lost when those base cabinets are removed. This space, however, is not entirely lost for storage because a movable cart can be installed under part of the work surface when not in use. When a person is using the kitchen, the removable cart can be pulled out and used as an additional work surface. Thus, the loss of base cabinets could be considered about 15 cubic feet (the sink drain would not allow the placement of a cart underneath). This space can be made up in several ways. First, more kitchen cabinets can be installed. Second, a bulk storage area can be combined with entry closets which would allow shifting little used items into bulk storage. Third, the 15 cubic foot of storage space could be added to a typical clothes closet. If entry clothes closets were provided conveniently adjacent to the kitchen, the additional storage space lost under counters could be made up by the use of part of the closet area.

Recommendation 13

HUD should prepare a "Guidebook on Accessible Housing". This book should include: 1) statement of HUD's policy on provision of accessibility in housing, 2) outline of accessibility provisions required in the MPS (see Recommendations 1, 4, 5, 6, 7, 8 and 11) for independent housing, and 3) example construction drawings and specifications.

Commentary: Most builders and architects find actual how-to-do-it information more valuable than standards for practical application. They want "solutions" not design criteria. The ANSI Standard cannot be a guidebook nor can the MPS. Moreover, neither can go beyond minimum provisions. A guidebook could have preferred conditions as well as the minimum. Including the policy statement and outline of provisions will provide all the relevant information on policy and regulations together, in one place so that the user won't have to refer to several documents. It can be in non-technical language so that it is short, concise and easy to understand.

Recommendation 14

HUD should prepare a set of "Guidelines for Establishing the Need for Accessible Housing".

Commentary: Although establishing need beyond a minimum number is best left to the local level, HUD should prepare criteria for establishing the proportion of accessible units above and beyond the minimum. This will provide a uniform method across the country and lead to a serious attempt to determine need and demand. The guidelines should include methods to interpret local housing data, analyze housing types in terms of potential for making them accessible (e.g. hi-rise vs. town houses, etc.), doing a market survey, involving consumers and builders in decision making and obtaining continual feedback from existing residents of accessible housing.

Summary

The recommendations proposed here are based on the goal of achieving as equal an opportunity for people with disabilities to find housing that is satisfactory to their needs as that of able-bodied people. This includes the availability of accessible dwelling units in: 1) housing built specifically for the elderly and people with disabilities, 2) general multi-family housing as well as, 3) single-family housing. For a full discussion of the rationale for this approach, refer to Adaptable Housing, by Steinfeld, Schroeder and Bishop. The cost implications of these recommendations can be found in the Cost of Accessibility, by Schroeder, et al. Both of these reports are products of this project.

The basic recommendations are as follows:

1. referencing ANSI A117.1 in the MPS,
2. establishing a minimum number of accessible units in multi-family housing and letting regional HUD offices establish a higher number based on local need/demand,
3. integrating accessibility criteria into the MPS for care-type facilities,
4. making some minor revisions to the MPS criteria that would restrict accessibility or cause increased costs if accessibility criteria in ANSI were referenced,
5. preparing a guidebook for design of accessible housing, and
6. preparing guidelines for establishing the need for accessible housing at a local level.